

EXHIBIT 4

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION**

JACOB DOE

Plaintiff,

v.

No. 1:23-cv-00041

**THE UNIVERSITY OF NORTH
CAROLINA SYSTEM, et al.**

Defendants.

**INTERVENORS ACLU OF NORTH CAROLINA LEGAL
FOUNDATION, FREEDOM OF THE PRESS FOUNDATION,
AND PROFESSOR EUGENE VOLOKH'S
JOINT MOTION TO UNSEAL RECORDS**

The American Civil Liberties Union of North Carolina (ACLU-NCLF), Freedom of the Press Foundation (FPF), and Professor Eugene Volokh jointly move to unseal the following records:

- Plaintiff's "Motion for a Temporary Restraining Order and Motion for a Preliminary Injunction" (ECF 4);

- Plaintiff's "Memorandum in Support [of] Plaintiff's Motion for a Temporary Restraining Order and Preliminary Injunction" (ECF 5);
- Any orders issued by this Court allowing plaintiff to proceed under seal; and
- Any motions and supporting materials relating to sealing.

Pursuant to LCvR 7.1(b), proposed Intervenors informed counsel for the parties of their intent to file this motion on February 27th, 2023. As of this filing, the parties have not responded with their positions on this motion.

Respectfully submitted this 28th day of February 2023 by:

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**ACLU OF NORTH
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FOUNDATION**

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**Counsel of record*

***Application for admission
forthcoming*